

September 16, 2019
File No. 01207310.00, Task 49

Part 71 Contact
c/o Scott Patefield
Director, Air Toxics and Technical Enforcement Program, 8ENF-AT
EPA Region 8
1595 Wynkoop Street (8P-AR)
Denver, CO 80202-1129
Ph: 303-312-6626

**Subject: Title V Semi-Annual Report of Required Monitoring
Tekoi Landfill, Tooele County, Utah (V-SV-000001-2016.00)**

Dear Mr. Patefield:

On behalf of CR Group, LLC. (CR Group), SCS Engineers (SCS) is submitting one copy of the Semi-Annual Title V Report of Required Monitoring (RRM) for Tekoi Landfill (Tekoi). The enclosed report complies with the reporting requirements of the Clean Air Act (CAA) Title V regulations (40 Code of Federal Regulations (CFR), Part 71).

The RRM covers the reporting period of January 1, 2019 through June 30, 2019. As specified in the Title V Permit, this submittal is due no later than October 1, 2019.

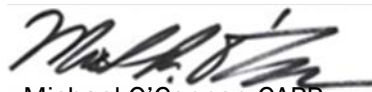
A Certification of Truth, Accuracy, and Completeness (CTAC), which has been signed by a responsible official from CR Group is also included in this submittal.

If you have any questions or require any additional information, please contact the undersigned at (707) 546-9461.

Sincerely,



Haley DeLong
Project Professional
SCS Engineers



Michael O'Connor, CAPP
Project Manager
SCS Engineers

cc: Sara Loiacono, EPA – electronic copy
Mark Franc, CR Group, LLC – electronic copy
Doc Nyiro, CR Group, LLC – electronic copy
Aaron Smith, CR Group, LLC – electronic copy

Enclosures



Federal Operating Permit Program (40 CFR Part 71)

CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) Franc (First) Mark (MI)

Title: Senior District Manager

Street or P.O. Box 6976 West California Avenue

City Salt Lake City State UT ZIP 84104 -

Telephone (801) 726 - 7052 Ext. Facsimile

B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) 

Name (typed) Mark Franc Date: 9 / 16 / 2019

Federal Operating Permit Program (40 CFR Part 71)

6-MONTH MONITORING REPORT (SIXMON)

Section A (General Information)

Permit No. V-SV-000001-2016.00

Reporting Period: Beg. 01 / 01 / 2019 End 06 / 30 / 2019

Source / Company Name Tekoi Landfill/CR Group, LLC

Mailing Address: Street or P.O. Box 6976 West California Avenue

City Salt Lake City State UT ZIP 84104 -

Contact person Mark Franc Title Senior District Manager

Telephone (801) 726 - 7052 Ext.

Continued on next page

Section B (Monitoring Report)

Summarize all required monitoring, data, or analyses required by the permit for the reporting period. Describe and cross-reference the permit term and list the emission units (Unit IDs) where the monitoring was performed. Indicate whether a separate monitoring report is required, and if required, enter the date submitted. If submitted for the first time as an attachment to this form, assign an attachment ID, mark the attachment with that ID, and attach the report to this form.

Monitoring, Data, or Analysis (describe and cite):

II.B. Standards for Air Emissions

1. The Permittee shall calculate an non-methane organic compound (NMOC) emission rate for the landfill using the procedure and default values specified in §60.754(a)(1).

- Permittee calculated an NMOC emission rate for the landfill using the procedure and default values specified in §60.754(a)(1).

Emission Units (Unit IDs): E1

Separate Report? ☒ Yes ☐ No Date 3 / 28 / 2008 Attachment ID NA

Monitoring, Data, or Analysis (describe and cite):

II.B. Standards for Air Emissions

- 2.(b) If the calculated NMOC emission rate using the default values of §60.754(a)(1) is equal to or greater than 50 megagrams (Mg) per year using Tier 1, the Permittee shall either:

- (ii) Determine a site-specific NMOC concentration and recalculate the NMOC emission rate using the procedures provided in paragraph §60.754(a)(3) and identified as Tier 2.

- Tier 2 sampling was completed and NMOC calculated using Tier 2 specifications.

Emission Units (Unit IDs): E1

Separate Report? ☒ Yes ☐ No Date 9 / 7 / 2018 Attachment ID NA

Monitoring, Data, or Analysis (describe and cite):

II.B. Standards for Air Emissions

3. **Tier 2:** The Permittee shall calculate a site-specific NMOC concentration as required by §60.754(a)(3) and recalculate the NMOC mass emission rate using the equations provided in §60.754(a)(1) using the average NMOC concentration from the collected samples instead of the default value in the equation in §60.754(a)(1).

- (a) If the resulting NMOC mass emission rate is less than 50 Mg per year using Tier 2, the Permittee shall:

- (i) Submit a periodic estimate of the emission rate report as provided in §60.757(b)(1); and
- (ii) Retest the site-specific NMOC concentration every 5 years using Tier 2.

- Tier 2 sampling was initially performed in 2008 and most recently on January 30, 2018, and the NMOC emissions were calculated to be less than 50 Mg. A 5-year NMOC emissions rate report was submitted on April 5, 2018, and includes NMOC emissions for the years 2018 - 2022. Per the EPA's request, a revised 5-year NMOC emissions rate report dated September 7, 2018 was submitted to the EPA to correct the average NMOC concentration to account for oxygen and nitrogen. The re-calculated NMOC emissions using the corrected NMOC concentration continued to show NMOC emissions below 50 Mg per year for 2018 – 2022.

Emission Units (Unit IDs): E1

Separate Report? ☒ Yes ☐ No Date 9 / 7 / 2018 Attachment ID NA

Monitoring, Data, or Analysis (describe and cite):

II.D. Monitoring of Operations

The requirements of §60.756(a) - (f) shall be used to monitor the capture and control system requirements of §60.752(b)(2).

- Not applicable. Owner/operator will comply with above procedures for determining compliance with the gas collection system once system is required to be installed.

Emission Units (Unit IDs): E1

Separate Report? ☐ Yes ☒ No Date / / Attachment ID

Monitoring, Data, or Analysis (describe and cite):

III.B. Non-Methane Organic Compound Emission Rate <50 Mg/year

If the uncontrolled NMOC emission rate is less than 50 Mg per year, as calculated according to §60.754(a) of the MSW landfills new source performance standards in 40 CFR part 60, subpart WWW, the Permittee shall recalculate the NMOC emission rate annually as specified in 40 CFR 60.752(b)(1) using the procedures specified in 40 CFR 60.754(a)(1) until such time as the calculated NMOC emission rate is equal to or greater than 50 Mg per year, or the landfill is closed.

- Tier 2 report was submitted within 180 days of Tier 1 calculation exceeding 50 Mg per year. Tier 2 sampling was initially performed in 2008 and most recently on January 30, 2018. A 5-year NMOC emissions report covering 2018 – 2022 was submitted on April 5, 2018 showing the NMOC emission rate is below 50 Mg per year. Per the EPA's request, a revised 5-year NMOC report dated September 7, 2018 was submitted to the EPA to correct the average NMOC concentration for oxygen and nitrogen. The re-calculated NMOC emissions using the corrected NMOC concentration continued to show NMOC emissions below 50 Mg per year for 2018 – 2022.

Emission Units (Unit IDs): E1

Separate Report? ☒ Yes ☐ No Date 9 / 7 / 2018 Attachment ID NA

Monitoring, Data, or Analysis (describe and cite):

III.C. Non-Methane Organic Compound Emission Rate \geq 50 Mg/year

3. Monitoring and Testing [40 CFR 63.1980(g)]

If the Permittee adds any liquids other than leachate in a controlled fashion to the waste mass and does not comply with the bioreactor requirements in §§63.1947, 63.1955(c) and 63.1980(c) through (f) of 40 CFR part 63, subpart AAAA, the Permittee must keep a record of calculations as specified in §63.1980(g).

-Not applicable. No liquids other than leachate are added to the waste mass.

Emission Units (Unit IDs): E1

Separate Report? ☐ Yes ☒ No Date ____/____/____ Attachment ID ____

Monitoring, Data, or Analysis (describe and cite):

III.C. Non-Methane Organic Compound Emission Rate \geq 50 Mg/year

4. Recordkeeping and Reporting Requirements

- (a) The Permittee must comply with the recordkeeping requirements as specified in §60.758(a) of 40 CFR part 60, subpart WWW, except that the annual report described in 40 CFR §60.757(f) must be submitted every 6 months.
- (b) The Permittee must keep records and reports as specified in the general provisions of 40 CFR part 60 and in Table 1 of 40 CFR part 63, subpart AAAA. Applicable records in the general provisions include items such as startup, shutdown and malfunction (SSM) plans and the SSM plan reports.

- The owner/operator maintains applicable records. No GCCS has been installed because NMOC is less than 50 Mg, therefore the annual report described in 40 CFR 60.757(f) and the recordkeeping requirements of 40 CFR part 63, subpart AAAA are not required.

Emission Units (Unit IDs): E1

Separate Report? ☐ Yes ☒ No Date ____/____/____ Attachment ID ____

Monitoring, Data, or Analysis (describe and cite):

IV.C. Requirements for Engines IE1 and E3

1. Emission and Operating Limitations

a. Except during periods of startup, the Permittee shall:

- i. Change oil and filter every 1,000 hours of operation or annually, whichever comes first;
- ii. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first;
- iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

- Maintenance requirements listed above were implemented for IE1 and E3 during this reporting period.

Emission Units (Unit IDs): IE1 and E3

Separate Report? ☐ Yes ☒ No Date / / Attachment ID

Monitoring, Data, or Analysis (describe and cite):

IV.C Requirements for Engines IE1 and E3**2. Testing and Initial Compliance Requirements**

The Permittee must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide, to the extent practicable, for the maintenance and operation of the engine in a manner consistent with good air pollution control practices for minimizing emissions.

- Records are maintained to document that maintenance is performed according to the maintenance plan.

Emission Units (Unit IDs): IE1 and E3

Separate Report? ☐ Yes ☒ No Date / / Attachment ID

Monitoring, Data, or Analysis (describe and cite):

IV.C. Requirements for Engines IE1 and E3**4. Notifications, Reports, and Records**

- a. The Permittee must submit notifications as specified in §63.6645.
- b. The Permittee must submit reports as specified in §63.6650.
- c. The Permittee must keep records as specified in §63.6655.
- d. The Permittee must keep records in the format and for the duration as specified in

§63.6660.

- Notifications and reporting requirements are not applicable. Records of operation and maintenance for IE1 and E3 are maintained.

Emission Units (Unit IDs): IE1 and E3

Separate Report? ☐ Yes ☒ No Date / / Attachment ID

Monitoring, Data, or Analysis (describe and cite):

V. Requirements for Engine IE3.

C. Compliance Requirements for Owners and Operators

- a. The Permittee, as the owner or operator of the SI ICE, must
 - i. Comply with the emission standards;
 - ii. Operate and maintain the stationary SI internal combustion engine and control device according to the manufacturer's written instructions or procedures developed and approved by the engine manufacturer;
 - iii. Only change those settings that are permitted by the manufacturer; and
 - iv. Meet the requirements of 40 CFR parts 90 or 1054, as they apply.

- Owner/operator maintains appropriate records of manufacturer data indicating compliance with the standards, operates and maintains IE3 according to the manufacturer's written instructions, and only changes the settings that are permitted by the manufacturer. Documentation demonstrating IE3 is certified to meet the emission standards set forth in §1054.105 is also maintained.

Emission Units (Unit IDs): IE3

Separate Report? ☐ Yes ☒ No Date / / Attachment ID

Monitoring, Data, or Analysis (describe and cite):

VI.A. Recordkeeping Requirements

The Permittee shall comply with the following generally applicable recordkeeping requirements:

1. If the Permittee determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants (HAPs) is not subject to a relevant standard or other requirement established under 40 CFR part 63, the Permittee shall keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination shall include an analysis (or other information) that demonstrates why the Permittee believes the source is unaffected (e.g., because the source is an area source).

2. Records shall be kept of off permit changes, as required by the Off Permit Changes section of this permit.

- Owner/operator maintains appropriate records. No Off Permit Changes have been made; therefore, Part 2 of this recordkeeping requirement is not applicable.

Emission Units (Unit IDs): Facility Wide

Separate Report? ☐ Yes ☒ No Date / / Attachment ID

Section C (Deviations Already “Promptly” Reported)

Summarize all deviations from permit terms already reported on form **PDR** during the reporting period. Copy this page as many times as necessary to include all such deviations. Describe and cross-reference the permit terms and report the start and end dates and times of the deviations (mo/day/yr, hr:min). Use the 24-hour clock. Also specify the date when the written deviation report was submitted to the permitting authority (If written report required, but not submitted, leave the date field blank). Note that failure to submit a deviation report, or late submittal, is a deviation that must be reported in the Section D.

<p>Permit Term for Which There was a Deviation: <u>Not Applicable</u></p> <p>Emission Units (unit IDs):</p> <p>Deviation Start ____/____/____ ____:____ End:____/____/____ ____:____</p> <p>Date Written Report Submitted ____/____/____</p>
<p>Permit Term for Which There was a Deviation:</p> <p>Emission Units (unit IDs):</p> <p>Deviation Start ____/____/____ ____:____ End:____/____/____ ____:____</p> <p>Date Written Report Submitted ____/____/____</p>
<p>Permit Term for Which There was a Deviation:</p> <p>Emission Units (unit IDs):</p> <p>Deviation Start ____/____/____ ____:____ End:____/____/____ ____:____</p> <p>Date Written Report Submitted ____/____/____</p>
<p>Permit Term for Which There was a Deviation:</p> <p>Emission Units (unit IDs):</p> <p>Deviation Start ____/____/____ ____:____ End:____/____/____ ____:____</p> <p>Date Written Report Submitted ____/____/____</p>

Section D (Deviations Reported Semiannually)

This section is for deviations reported for the first time in this six-month monitoring report. Describe and cross-reference the permit terms and emission units that apply to the deviation. Copy this page as many times as necessary to include all such deviations. Report the beginning and ending times (mo/day/yr, hr:min) for each deviation. Use the 24-hour clock. Briefly explain (if known) the probable cause of each deviation. If any corrective actions or preventative measures have been taken to avoid these in the future, briefly describe the measures, including when they occurred.

Permit Term (for Which There is a Deviation): **Not Applicable**

Emission Units (unit IDs)

Deviation Start: ____/____/____ ____:____ End: ____/____/____ ____:____

Probable Cause of Deviation:

Corrective Actions or Preventative Measures Taken:

Permit Term (for Which There is a Deviation):

Emission Units (unit IDs)

Deviation Start: ____/____/____ ____:____ End: ____/____/____ ____:____

Probable Cause of Deviation:

Corrective Actions or Preventative Measures Taken:

Permit Term (for Which There is a Deviation):

Emission Units (unit IDs)

Deviation Start: ____/____/____ ____:____ End: ____/____/____ ____:____

Probable Cause of Deviation:

Corrective Actions or Preventative Measures Taken: